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Attorneys for Defendants Bugher, Crites, DiGiulio, and Irving

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON

JABBAR SACHET AL-KHAFAGI,

Plaintiff,

v.

CHARLES C. SUNG, MD; (FNU) CRITES,
Oregon State Correctional Institution (OSCI),
Registered Nurse (RN); LORETTA IRVING,
(OSCI) Medical Services Manager;
CHRISTOPHER DIGIULIO, Oregon
Department of Corrections (ODOC) Medical
Director; JOE BUGHER, ODOC Health
Services Administrator; and JOHN AND
JANE DOES 1-20,

Defendants.

Case No. 2:19-CV-00669-MO

DEFENDANTS' THIRD MOTION FOR
EXTENSION OF TIME TO FILE
DISCOVERY, EXPERT DISCLOSURES,
AND DISPOSITIVE MOTIONS

CERTIFICATE OF CONFERRAL

Pursuant to L.R. 7-1(a)(1)(C), counsel for defendants certifies that the plaintiff is a prisoner not represented by counsel and is presently in the custody of the Oregon Department of Corrections (ODOC).

MOTION

The current deadline to file the discovery, expert disclosures, and dispositive motions in this case is **December 13, 2021**. (Order at ECF No. 68). Defendants respectfully request an extension of discovery, expert disclosures and dispositive motions for an additional on hundred and twenty (120) days, to and including **April 12, 2022**.

This motion is supported by the declaration of Robert Sullivan, Senior Assistant Attorney General, and the records and files herein.

DATED December 13, 2021.

Respectfully submitted,

ELLEN F. ROSENBLUM
Attorney General

s/ Robert E. Sullivan
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Trial Attorney
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Of Attorneys for Defendants

CERTIFICATE OF SERVICE

I certify that on December 13, 2021, I served the foregoing DEFENDANTS' THIRD MOTION FOR EXTENSION OF TIME TO FILE DISCOVERY, EXPERT DISCLOSURES, AND DISPOSITIVE MOTIONS upon the parties hereto by the method indicated below, and addressed to the following:

JABBAR SACHET AL-KHAFAGI
SID#10877333

Oregon State Correctional Institution
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Pro Se Plaintiff

☐ HAND DELIVERY
☒ MAIL DELIVERY
☐ OVERNIGHT MAIL
☐ TELECOPY (FAX)
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s/ Robert E. Sullivan

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